# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

LESTER LEE	
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Plaintiff

V.

Case No. 8:24-cv-01205-TJS

#### **BROOKSIDE PARK CONDOMINIUM,**

INC., et al.,

**Defendants** 

# PLAINTIFF'S MOTION FOR LEAVE TO FILE OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT OUT OF TIME

Plaintiff, Lester Lee, respectfully moves this Court for leave to file his Opposition to Defendants' Motion for Summary Judgment out of time, and in support thereof states the following:

- 1. On March 14, 2025, Defendants filed a Motion for Summary Judgment.
- 2. Plaintiff is a pro se litigant who only recently assumed responsibility for his own filings after the withdrawal of former counsel and the recent completion of complex discovery responses.

- Plaintiff has been diligently working to gather evidence, complete discovery responses, and prepare his opposition materials, including exhibits, declarations, and a timeline of disputed facts.
- 4. Plaintiff respectfully requests leave to file his opposition no later than, June 2, 2025.
- 5. No party will be prejudiced by this brief extension, and justice favors a full review of the record before judgment is rendered.

WHEREFORE, Plaintiff respectfully requests this Honorable Court grant leave to file the opposition to summary judgment out of time and permit the attached opposition documents to be accepted and considered on the merits.

Respectfully submitted,

Lester Lee

Pro Se Plaintiff

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#### CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of May, 2025, a copy of the foregoing Motion for Leave to File Opposition to Defendants' Motion for Summary Judgment Out of Time was served via First Class U.S. Mail and/or electronically via CM/ECF upon the following:

### Anthony D. Dwyer

Eccleston & Wolf, P.C. 7240 Parkway Drive, 4th Floor Hanover, MD 21076 dwyer@ewva.com Attorney for Defendants Brookside, Metropolis, and Rammy Azoulay

## Henry T. Carkhuff

Eccleston & Wolf, P.C. 7240 Parkway Drive Hanover, MD 21076 carkhuff@ewmd.com Attorney for Defendants Brookside, Metropolis, and Rammy Azoulay

#### **Richard Bruce Rosenthal**

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Respectfully submitted,

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